

HOWARD LEVENTHAL
REG. NO. 46376-424
METROPOLITAN DETENTION CR.
P.O. BOX 329003
BROOKLYN, NY 11232

DEC 21, 2015

WINSTON PAES

ASSISTANT U.S. ATTORNEY
EASTERN DISTRICT OF NEW YORK
(via PACER/ECF)

RE: U.S. v. LEVENTHAL
CASE NO. 13-cr-695(BMC)

SUPPLEMENT TO FOIA

DEMAND DATED DEC 8, 2015

MR. PAES:

THIS LETTER SUPPLEMENTS MY F.O.I.A. DEMAND
DATED DEC 8, 2015 AND SERVED TO YOU VIA ECF/
PACER ON 12/14/15.

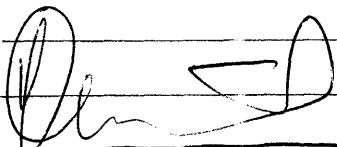
THIS DEMAND UPON YOUR OFFICE AND THE GOVERNMENT
IS BOTH FOR HISTORICAL ITEMS, CURRENT AND
FUTURE ONGOING ITEMS. YOUR PRODUCTION OF THE
DEMANDED ITEMS SHOULD INCLUDE EVERY ITEM
UP TO THE DATE OF FIRST PRODUCTION AND THEN
AFTERWARD, ALL ITEMS NEWLY PRODUCED.

BY WAY OF EXAMPLE, YOUR PRODUCTION SHOULD INCLUDE
ALL INTERNAL AND EXTERNAL TEXTUAL COMMUNICATIONS
WHICH HAVE TAKEN PLACE SINCE THE DAY AND TIME OF
SERVICE OF MY DEC 8, 2015 FOIA DEMAND THROUGH
TODAY AND THE MOST CURRENT DATE UNTIL THE DAY
AND TIME OF PRODUCTION. I HEREBY REQUEST UPDATES
AT THIRTY (30) DAY INTERVALS UNTIL FURTHER NOTICE,
OF ALL ITEMS NEWLY GENERATED WITHIN THE PRIOR
THIRTY DAYS - INCLUSIVE OF "PERSONAL" MESSAGES

BETWEEN YOURSELF AND ANY PARTY INVOLVED IN THIS MATTER, IN EVERY AND ANY WAY, REGARDLESS OF WHETHER OR NOT SUCH MESSAGES WERE GENERATED ON "PERSONAL" OR MOBILE DEVICES, REGARDLESS OF THE PUTATIVE OWNERSHIP OF SUCH DEVICES.

LASTLY I HEREBY REMIND YOU THAT REGARDLESS OF YOUR ANTI PATHY TOWARD ME, YOU ARE REQUIRED TO SERVE ALL PRODUCTION OF ITEMS REQUESTED UNDER THIS SUPPLEMENT AND THE ORIGINAL FOIA REQUEST AND ANY AND EVERY OFFICIAL COMMUNICATION TO THE COURT REGARDING THE CAPTIONED MATTER, TO ME DIRECTLY AT THE ADDRESS PROVIDED ABOVE. KINDLY CONSULT WITH THE INSTITUTION FOR ANY RESTRICTIONS UPON PHYSICAL DELIVERY THAT MIGHT IMPEDE COMPLETE DELIVERY OF PRODUCTION.

YOURS TRULY,



HOWARD LEVENTHAL
DEFENDANT PRO SE